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Attorneys for HercRentals Inc.

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

In re

PG&E CORPORATION,

and

PACIFIC GAS & ELECTRIC COMPANY,

Debtors,

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)

Chapter 11

CASE NO. 3:19-bk-30088 (DM)

(Lead Case)

(Jointly Administered)

NOTICE OF PERFECTION OF LIEN  
PURSUANT TO 11 U.S.C. § 546(b)

NOTICE IS HEREBY GIVEN that HercRentals Inc. (“Herc”), equipment lessor under certain pre-petition contracts, including but not limited to PG&E contract No. 4400010112, as such contracts have been amended and restated or otherwise modified or supplemented from time to time (altogether, the “Contracts”), provided equipment for certain engineering, design, and construction services to the Debtors in various counties (the “Properties”) before the petition date and there is owing no less than \$689,129.87.

1 Pursuant to California Civ. Code § 8000 et. seq., Herc is entitled to, and hereby asserts, and  
2 intends to enforce its lien rights and, pursuant to 11 U.S.C. § 546(b), Herc hereby gives this Notice in lieu  
3 of the commencement of any action to perfect, maintain, or continue Herc's liens. Herc requests  
4 adequate protection of its liens. A true and correct copy of Herc's liens in each respective county are  
5 collectively attached hereto as Exhibit A.

6 Herc provides notice of its rights as a perfected lienholder in the Properties pursuant to  
7 California's mechanic's lien law. Herc is filing and serving this notice to preserve, perfect, maintain, and  
8 continue the perfection of its lien and its rights in the Properties to comply with the requirements of  
9 California state law, 11 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2) and any other applicable law. This  
10 notice constitutes the legal equivalent of having commenced an action to foreclose the lien in the proper  
11 court. By this notice, the Debtors and other parties in interest are estopped from claiming that the lawsuit  
12 to enforce Herc's Mechanic's Liens were not timely commenced pursuant to applicable state law. The  
13 interests perfected, maintained, or continued by 11 U.S.C. § 546(b)(2) extend in and to the proceeds,  
14 products, offspring, rents, or profits of the Properties.

15 This Notice shall not be construed as an admission that such filing is required or to the necessity  
16 of recording, commencement, or seizure. This Notice shall preserve and continue to preserve any and all  
17 of Herc's rights as to its Mechanic's Liens.

18 This Notice does not waive Herc's right to seek relief from the automatic stay to foreclose its  
19 Mechanic's Liens and/or a waiver of any other rights or defenses.

20 Herc asserts secured interests in the Properties to the fullest extent allowed by applicable law,  
21 including interest and attorneys' fees. Further, Herc reserves the right to supplement and/or amend this  
22 Notice, and reserves any and all other rights under applicable law.

23 DATED: April 15, 2019

GREENBERG TRAURIG, LLP

24  
25 By /s/ Howard J. Steinberg

26 Howard J. Steinberg  
27 Attorneys for HercRentals Inc.  
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